

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Karen M. Williams,  
Magistrate Judge

Honorable Thomas Vanaskie  
(Ret.), Special Discovery Master

**NOTICE OF CROSS  
MOTION FOR  
PROTECTIVE ORDER**

**NOTICE OF THE ZHP PARTIES' MOTION FOR PROTECTIVE ORDER  
PRECLUDING THE PRODUCTION OF DOCUMENTS WITHHELD AS  
CHINESE STATE SECRETS**

To: Adam M. Slater, Esquire  
Mazie Slater Katz & Freeman  
103 Eisenhower Parkway  
Roseland, NJ 07068

**PLEASE TAKE NOTICE** that on May 21, 2021, the ZHP Parties, by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler, the Honorable Karen M. Williams, and the Honorable Special Master Thomas I. Vanaskie, for an entry of a Protective Order precluding the production of documents withheld as Chinese state secrets.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, the ZHP Parties shall rely on the accompanying Brief in Opposition to Plaintiffs' Motion to Compel Production of Documents Withheld as Chinese State Secrets and in Support of Cross Motion for Protective Order.

**PLEASE TAKE FURTHER NOTICE** that, for the Court's convenience, a proposed form of Order pursuant to Local Civil Rule 5.3(c)(6), is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that the undersigned attorneys for the ZHP Parties request oral argument on this motion.

**PLEASE TAKE FURTHER NOTICE** that a Certificate of Service attesting to the date and manner of service is submitted herewith.

May 21, 2021

Respectfully submitted,

By: /s/ Seth A. Goldberg

DUANE MORRISLLP  
Seth A. Goldberg  
30 South 17th Street  
Philadelphia, Pennsylvania 19103  
Tel.: (215)979-1000  
Fax: (215) 979-1020  
SAGoldberg@duanemorris.com

*Attorneys for Zhejiang Huahai  
Pharmaceutical Co, Ltd., Huahai*

*U.S., Inc., Princeton Pharmaceutical  
Inc., and Solco Healthcare US, LLC*